



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

1875 New Hope Street
Norristown, PA 19401
215 270-1975

June 5, 1990

Mr. David R. Haldeman
Scott Paper Company
Front and "Avenue of the States"
Chester, PA 19013

to file

Re: LUST/GW
Scott Paper - Chester Operations
City of Chester
Delaware County

Dear Mr. Haldeman:

The purpose of this letter is to summarize our meeting with you and your consultants on May 21, 1990 and provide you with comments subsequent to our review of the Buchart-Horn, Inc. "Underground Storage Tank Removal Report" of November 11, 1989 and the Groundwater Technology, Inc. "Preliminary Work Plan" of March 1990, both regarding the above referenced site.

The Buchart-Horn report details the removal of seven underground storage tanks from your Chester Facility and provides analytical data from soil and liquid samples collected in conjunction with these tanks removals. This report documents that contaminants were released from these tanks into the subsurface. Products contained in these tanks consisted of #2 fuel oil, gasoline, kerosene, mineral oil, waste oil, and virgin xylene. The analytical results from the materials excavated show the subsurface of this site to be degraded by xylenes, ethylbenzene and petroleum hydrocarbons. In this material, total xylenes ranged from non-detectable to 1,750 ppm, total petroleum hydrocarbons ranged from non-detectable to 3,100 ppm, and ethylbenzene concentrations ranged from non-detectable to 350 ppm. This report fails to adequately document the degree of contamination in the soils remaining in place which previously surrounded the now excavated storage tanks.

The work plan submitted by Groundwater Technology consists only of a conceptual plan for bioremediation of the excavated soil. Groundwater Technology proposes to construct soil treatment cells in the coal yard at your facility in which remediation of the contaminated material will occur. Once remediation is achieved, this material will be used for fill at your facility.

Our meeting on May 21, 1990 focused on two main issues, determining the clean-up criteria for the excavated soil and determining the disposition of the xylene contaminated soil and fill material as xylene is a U-239 listed hazardous waste. Regarding the clean-up criteria, it was decided that remediated soils would be used for fill in the coal yard, therefore, clean-up levels would be equal to background levels for this area of the site. Groundwater Technology agreed to

Mr. David R. Haldeman
June 5, 1990

- 2 -

submit a work plan detailing locations and depths of soil samples to be collected in order to determine background contaminant concentrations. These samples will be analyzed for total petroleum hydrocarbons, and benzene, ethylbenzene, toluene and xylene (BTEX) using the appropriate EPA Methodology.

The Department is very concerned about the treatment and ultimate disposal of xylene contaminated wastes on site. After further evaluation, we recommend that all material excavated from around and inside the kerosene tank and xylene rail car tank be removed from the bioremediation plan and disposed of off site. If these materials remain part of the on-site remediation, operation of the treatment cells will involve strict compliance requirements to operate as hazardous waste treatment units and may require permitting by our Bureau of Waste Management.

Other items discussed at the meeting involved the detection of 590 ppb of polychlorinated biphenols (PCB's) in a soil sample collected near the waste oil tank, the need for permits to operate the treatment unit, and the occurrence of free product in monitoring well MW-1. We requested that excavated soils be analyzed for PCB's and also that the extent of PCB's in the soils near the waste oil tank be further defined. With regard to permitting, we stated that you would need to contact our Bureau of Air Quality Control for a determination as to whether they would require a permit for the air emissions. Also, as long as there was no discharge involved, the Bureau of Water Quality Management would not require permits. If Bureau of Waste Management permits are needed, they would be related to the handling of U-239 listed hazardous waste. The occurrence of free phase hydrocarbons in MW-1 was explained by the fact that this well was drilled as part of a separate ground-water contamination investigation on this site.

In the winter of 1988-89, a hydrocarbon sheen was noted on the water in the bulkhead area of this facility. Subsequent investigations revealed that a corrosion leak in a transmission line carrying fuel oil from the dock at the river to an above ground storage tank had released an unknown volume product to the subsurface. Presently two, two-foot diameter recovery wells have been placed near the leak, however, other necessary equipment has not yet been installed. I have checked our files and cannot find any site investigation/work plan for this release. You are requested to submit a report detailing the extent and degree of subsurface contamination which resulted from this release, and the means by which you intend to remediate this contamination along with a time table for accomplishing this remediation by July 2, 1990.

In addition to the two previously mentioned reports, we are also in receipt of an interim ground-water monitoring report dated May 11, 1990 from Groundwater Technology. Data provided in this report documents that serious degradation of the subsurface has occurred at your facility due to product release from several leaking underground storage tanks. You are requested to submit a report detailing the results of your ground-water monitoring program, the extent of

Mr. David R. Haldeman

June 5, 1990

- 3 -

subsurface contamination, and the means by which you intend to remediate both the contaminated soil remaining in place which previously surrounded the now excavated storage tanks and the contaminated ground water at your facility along with a time table for achieving this remediation by July 2, 1990.

If you have any questions, please feel free to contact me at (215) 270-1990.

Very truly yours,

KELLY L. KINKAID
Hydrogeologist

cc: Mr. Breitenstein
Mr. Formeck
Ms. Perry - Groundwater Technology, Inc.
Re 30 (SMS)213.9